

**Council of Mayors**

South East Queensland

The Council of Mayors (SEQ)

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Ms Patricia Scott  
Chair  
National Broadband Network Panel of Experts  
Department of Broadband, Communications and the Digital Economy  
GPO Box 2154  
CANBERRA ACT 2601

Email: [nationalbroadbandnetwork@dbcde.gov.au](mailto:nationalbroadbandnetwork@dbcde.gov.au)

Dear Ms Scott,

I am writing to you in response to the request for public comments on the *National Broadband Network* invited by the Minister for Broadband, Communications and the Digital Economy, Senator the Hon Stephen Conroy, on 17 March 2008.

The Council of Mayors (SEQ) is the key political and advocacy organisation for local government in South East Queensland. Our objective is to improve the long-term viability, wellbeing and sustainability of the region. The Council of Mayors (SEQ) represents one in seven Australians across 11 urban and rural local government areas in South East Queensland, and comprises the Mayors of these 11 councils.

We are pleased that the new Australian Government is demonstrating its commitment to, and grasping with both hands, the challenge this nation faces in achieving a true and sustainable next generation broadband capability.

The Council of Mayors (SEQ) sought the assistance of *Broadband Connect* funding in 2007 to establish a next generation, fibre optic customer access broadband network of 50+ Mbps throughout South East Queensland, under the banner of ConnectSEQ. There was strong State political support for a local government-owned, carrier neutral, open access model to finally bring infrastructure-based competition in digital content and on-line services to businesses and residents of the region. ConnectSEQ was seen to provide an innovative, scalable and cost effective opportunity to provide a significant subset of the Australian population with the necessary technology to be competitive at a global scale.

We note the Senator's comments at the Australian Telecommunications Users Group conference on 12 March 2008 in relation to developing the next generation broadband capability for the nation in a modular approach. It is our experience, having

developed the ConnectSEQ model, that an approach which encompasses natural areas of association, in terms of political, geographical and technical roll-out design efficiencies, avoids many of the stumbling blocks faced when attempting to design a whole-of-nation single solution or point solutions which lack scale or strategic relationships.

Interconnectivity between modular regions is ensured by the technical solution following international standards and non-proprietary technology. Just as Australia connects to the global communication networks through these standards, modular regions within Australia will connect to each other.

The ConnectSEQ project has maintained continuous liaison with the Queensland Government and was formally supported in its *Broadband Connect* application by the then Treasurer, the Hon Anna Bligh. The Council of Mayors (SEQ) is a partner with the State Government on the South East Queensland Regional Plan, a statutory plan which sets out a strategic land use plan for development in the region through to 2026. The Regional Plan specifically identifies the deployment of high speed broadband telecommunications in the region as a policy, and is supported by the SEQ Infrastructure Plan and Program with \$82bn funding earmarked in 2007 over the next 20 years.

Local government is ideally placed as the government authority charged with providing infrastructure out into the community, with management of planning development processes and access to easements. The provision of next generation broadband capability aligns with community, economic and regional development priorities of councils, in both urban and rural areas.

Local government is also a partner with the State Government in the establishment of the water grid in South East Queensland. By utilising these new easements and their reach through Brisbane and out into the regional areas, a new high capacity backbone trunk network can be built that does not duplicate existing trunk paths. Ultimately, the benefits that can be achieved include implementation at a lower cost and transparent governance of open access arrangements.

Our experience in consulting with property developers is that the great majority of greenfield sites could be provisioned with Fibre to the Premises infrastructure on a voluntary basis in favour of local government or a ConnectSEQ-type entity. National consistency in building codes would facilitate this and move us beyond the current model whereby only basic copper wire telephone services are provisioned into developments.

For customer access network roll-out into brownfield sites, there are three main options. Firstly, Fibre to the Node with continued use of the copper network; secondly, Fibre to the Wireless Access Point, for example WiMAX; and thirdly, Fibre to the Premises. The combination of these options is optimal, with Fibre to the Premises being the long-term goal. It is our experience that should a ConnectSEQ-type authority exist and that the telecommunications marketplace have confidence in its technical capacity and application of open access commercial arrangements, then a vibrant and highly competitive access network market would continue to develop. If the *National Broadband Network* program were able to create the environment that

allowed this diverse last mile access network marketplace to develop, it would create a sustainable solution and not one that would require yet another program approach to upgrade minimum service levels within 4-6 years.

The ConnectSEQ proposal was clearly differentiated from the OPEL bid and current Fibre to the Node discussions in that it was founded upon a design that would scale both backbone and access network terms. By using high fibre count trunks and DWDM transmission equipment, the capacity to deliver high quality services which scale to 100 Mbps symmetrical to the premise was assured. We assert that the *National Broadband Network* must deliver equivalent backbone and trunk capacity even if the access network will be limited to 12 Mbps.

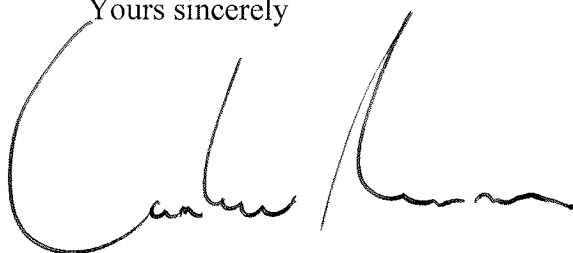
A key benefit of ConnectSEQ's high capacity and scalable trunk network is that it will be able to pervasively deliver 100 megabit per second to multi-gigabit per second bandwidth into schools, educational institutions and health facilities across the South East Queensland footprint, which covers the nation's fastest growing region.

For sustainable telecommunications industry development, including competitive customer access networks, steadfast, consistent and unambiguous open access arrangements must be implemented. Without this key tenet, the industry will not have confidence to invest and the net result will be a higher cost to the taxpayer with an inferior and unsustainable *National Broadband Network* program result. Regulatory certainty is also a fundamental component to facilitate sustainable market place development, effective competition and maximum consumer benefit.

The Council of Mayors (SEQ) would ask that the Panel of Experts take forward the opportunities that are afforded by modular bids as well as clear benefits of the open access, infrastructure-based competition model facilitated by local government. The ConnectSEQ project has already formed its marketplace, community and political relationships, and looks forward to making a modular submission and being seen as a test case for a new and innovative way to break the deadlock.

I would appreciate your consideration of these comments, and look forward to further information on opportunities under the *National Broadband Network*.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Campbell Newman', written in a cursive style.

Campbell Newman  
**CHAIRMAN**

cc: The Hon Anna Bligh MP, Premier  
President, Local Government Association of Queensland  
SEQ Mayors